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8 Attorneys for Defendants

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 SUMER VAINSHTOK,)
13 Plaintiff,) Case No. 06-4277 EDL
14 v.)
15 DEPARTMENT OF HOMELAND SECURITY) **STIPULATION TO DISMISS AND**
("DHS"); MICHAEL CHERTOFF, Secretary, DHS;) **[PROPOSED] ORDER**
16 ALBERTO GONZALES, United States Attorney)
General; THE UNITED STATES CITIZENSHIP &)
17 IMMIGRATION SERVICES ("USCIS");)
EMILIO T. GONZALEZ, Director, USCIS;)
18 ALFONSO AGUILAR, Chief, USCIS; DAVID)
STILL, District Director, USCIS,)
19 Defendants.)
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21 Plaintiff and Defendants, by and through their attorneys of record, hereby stipulate, subject to
22 the approval of the Court, to dismissal of the above-entitled action without prejudice because the
23 United States Citizenship and Immigration Services is now prepared to adjudicate Plaintiff's
24 application for naturalization and agrees to adjudicate such application within 30 days of the
25 dismissal of this action.

26 Each of the parties shall bear their own costs and fees.
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1 Date: August 11, 2006

Respectfully submitted,

2 KEVIN V. RYAN
United States Attorney

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/s/

5 ILA C. DEISS
Assistant United States Attorney
6 Attorneys for Respondents

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Date: August 11, 2006

/s/
9 GERI N. KAHN
Attorney for Plaintiff

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ORDER

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Pursuant to stipulation, IT IS SO ORDERED.

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Date: August 17, 2006

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